

Message

From: Libelo, Laurence [Libelo.Laurence@epa.gov]
Sent: 9/4/2018 5:31:59 PM
To: Garvey, Mark [Garvey.Mark@epa.gov]; Lindstrom, Andrew [Lindstrom.Andrew@epa.gov]; Strynar, Mark [Strynar.Mark@epa.gov]; Washington, John [Washington.John@epa.gov]
Subject: RE: Chemours lawsuit filed Aug 29 by Cape Fear Watch

Hi Mark,

Thanks.

What is GENx? Is it the acid? The anion? Salts of the ion? A trademark for a 'a process to replace PFOA'?

GENx is not a chemical. It is a term use to mean lots of different things.

What they say is sort of correct, if GENx is defined at the anion of the dimer acid. Or maybe the non-dissociated acid with the hydrogen still attached depending on pH. The salt dissolves in water to release the HFPO-DA anion and ammonium ion. The acid also dissolves in water to give the same anion and a hydrogen ion. Same with the potassium salt, and other salts - They give the same anion and a cation.

For the acid the anion is attached to a hydrogen (the cation). In the P-08-0508 salt the cation is NH₃. Other cations K, etc all behave the same way as the ammonium salt.

The acid fluoride reacts with water (hydrolyzes) to the same ion. It is a chemical reaction moving atoms around on the molecule. This means covalent bonds are made and broken.

For a salt dissolving it is not covalent bonds forming or breaking. It is ionic bonds breaking.

Have I mentioned that I don't



From: Garvey, Mark
Sent: Tuesday, September 04, 2018 1:17 PM
To: Lindstrom, Andrew <Lindstrom.Andrew@epa.gov>; Strynar, Mark <Strynar.Mark@epa.gov>; Washington, John <Washington.John@epa.gov>; Libelo, Laurence <Libelo.Laurence@epa.gov>
Subject: FW: Chemours lawsuit filed Aug 29 by Cape Fear Watch

This group filed a Notice of Citizen Suit 60 days ago and now they are filing the complaint. In paragraph 114 it says: HFPO Dimer Acid Ammonium Salt (CAS 13252-13-6/P-08-508) readily turns to GenX (CAS 62037-80-3/P-08-509) in the presence of water.

Is that an accurate statement? Does it even make sense? It seems like it is saying GenX converts to GenX in water. I've been under the belief that HFPO has to be processed to HFPO Dimer Acid Fluoride to then convert (hydrolyze) to GenX (HFPO-Dimer Acid Ammonium Salt) in water.

I'm trying to understand what they're trying to say.

Thanks,

Mark

Mark Garvey

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Office of Civil Enforcement
Attorney
202-564-4168
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From: [REDACTED]
Sent: Tuesday, September 04, 2018 10:21 AM
To: Garvey, Mark <Garvey.Mark@epa.gov>; [REDACTED]
Cc: [REDACTED]
Subject: FW: Chemours lawsuit

You probably already know about this, but just in case.

[REDACTED] Senior Counsel
Federal Facilities Enforcement Office, 2261A
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, N.W.
Washington, D.C. 20004
(202)56 [REDACTED]
(202) 501-0069 (fax)
<http://www.fedcenter.gov>

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From: Starfield, Lawrence
Sent: Tuesday, September 04, 2018 8:50 AM
To: [REDACTED] Dixon,
Chelsea <Dixon.Chelsea@epa.gov>
Subject: FW: Chemours lawsuit

FYI, a suit against a private party re: PFAS.

Larry

From: Palmer, Leif
Sent: Friday, August 31, 2018 9:44 AM

To: Starfield, Lawrence <Starfield.Lawrence@epa.gov>

Subject: Fwd: Chemours lawsuit

Sent from my iPhone

Begin forwarded message:

From: "Palmer, Leif" <Palmer.Leif@epa.gov>

Date: August 31, 2018 at 9:43:22 AM EDT

To: "Leopold, Matt (OGC)" <Leopold.Matt@epa.gov>, "Bodine, Susan" <bodine.susan@epa.gov>

"Albores, Richard"

<Albores.Richard@epa.gov>, Larry Starfield <Larry.Starfield@usepa.onmicrosoft.com>

Cc: "Rubini, Suzanne" <Rubini.Suzanne@epa.gov>, "Ghosh, Mita" <Ghosh.Mita@epa.gov>, "Tucker, Marlene"

<Tucker.Marlene@epa.gov>, "Nowell, Valerie" <Nowell.Valerie@epa.gov>, "Nagrani, Kavita" <Nagrani.Kavita@epa.gov>

Subject: Fwd: Chemours lawsuit

Hello all — a TSCA & CWA citizen's suit has been filed against the Chemours facility in NC. We've not read it yet — but wanted to pass it on.

Sent from my iPhone

Begin forwarded message:

From: "Nagrani, Kavita" <Nagrani.Kavita@epa.gov>

Date: August 31, 2018 at 9:21:40 AM EDT

To: "Palmer, Leif" <Palmer.Leif@epa.gov>

Cc: "Rubini, Suzanne" <Rubini.Suzanne@epa.gov>, "Tucker, Marlene" <Tucker.Marlene@epa.gov>, "Nowell, Valerie"

<Nowell.Valerie@epa.gov>, "Ghosh, Mita" <Ghosh.Mita@epa.gov>

Subject: RE: Chemours lawsuit

Here it is — SELC linked to the complaint.

From: Palmer, Leif

Sent: Friday, August 31, 2018 9:17 AM

To: Nagrani, Kavita <Nagrani.Kavita@epa.gov>

Cc: Rubini, Suzanne <Rubini.Suzanne@epa.gov>; Tucker, Marlene <Tucker.Marlene@epa.gov>; Nowell, Valerie

<Nowell.Valerie@epa.gov>; Ghosh, Mita <Ghosh.Mita@epa.gov>

Subject: Re: Chemours lawsuit

Thanks for being alert. Please ask Josh Grimes or Saundi to see if the complaint is available on Pacer.

Marlene — please let Mark Garvey know.

I'll forward to OGC.

Sent from my iPhone

On Aug 31, 2018, at 9:08 AM, Nagrani, Kavita <Nagrani.Kavita@epa.gov> wrote:

Good morning,

I'm not sure if you all have seen this yet. It appears as though Cape Fear River Watch has filed a lawsuit against Chemours in the Eastern District of North Carolina on Wednesday alleging violations of the CWA and TSCA. I haven't read the complaint yet, but SELC's website (below) includes a link to the document.

<https://www.southernenvironment.org/news-and-press/news-feed/groups-sue-chemours-in-federal-court-to-stop-pfas-genx-pollution>

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